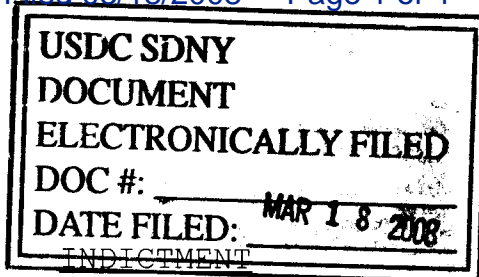


**Judge Marrero**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK- - - - -X  
UNITED STATES OF AMERICA :

-v.- :

08 Cr.

SHAEANDA SAPPLETON,

Defendant.

**08 CRIM 238**COUNT ONE

The Grand Jury charges:

1. From at least on or about March 26, 2007, up to and including in or about April 2007, in the Southern District of New York and elsewhere, SHABANDA SAPPLETON, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, to wit, Washington Mutual Bank, and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, SAPPLETON opened a bank account at Washington Mutual Bank, deposited a counterfeit check therein, and withdrew cash to which she was not entitled.

(Title 18, United States Code, Sections 1344 &amp; 2.)

COUNT TWO

The Grand Jury further charges:

2. From at least on or about February 21, 2006, up to and including in or about August 2006, in the Southern District of New York and elsewhere, SHABANDA SAPPLETON, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, to wit, Commerce Bank, N.A., and to obtain the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, SAPPLETON opened a bank account at Commerce Bank, N.A., deposited counterfeit checks therein, and withdrew cash to which she was not entitled.

(Title 18, United States Code, Sections 1344 & 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offenses alleged in this Indictment, SHABANDA SAPPLETON, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, constituting or derived from proceeds obtained directly or indirectly as a result of the offenses charged herein, to wit bank fraud.

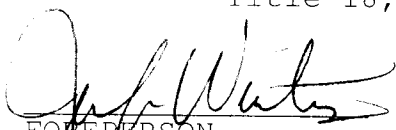
Substitute Asset Provision

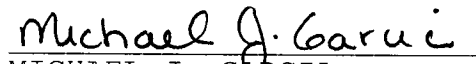
4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981,  
Title 28, United States Code, Section 2461, and  
Title 18, United States Code, Section 1344.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

SHABANDA SAPPLETON,

Defendant.

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INDICTMENT

08 Cr.

(18 U.S.C. §§ 1344 & 2)

MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

Foreperson.



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3/15/08 Filed Indictment. Case assigned to Judge Marrero.  
MC  
Pitman  
U.S.M.S.